

**COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY
ACT 104(E) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL #9590 9401 0007 5205 8737 34**

International Paper Company
c/o Certified Forest Management LLC
C T Corporation System
Registered Agent for Certified Forest Management LLC
1200 South Pine Island Road
Plantation, Florida 33324

Re: Colonial Creosote Superfund Site, Bogalusa, Washington Parish, Louisiana; CERCLIS #
LAN000607134; Information Request Pursuant to CERCLA Section 104(e), 42 U.S.C. Section 9604(e)

Dear Sir or Madam:

The U.S. Environmental Protection Agency (EPA) seeks cooperation from International Paper Company (hereinafter International Paper Company is referred to as "IPC," "you" or "your") in providing information and documents relating to the Colonial Creosote Superfund Site (Site) located in Bogalusa, Washington Parish, Louisiana. Information obtained will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that IPC is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending IPC this letter as part of its investigation of the circumstances related to the Site and does not expect IPC to pay for or perform any site-related activities at this time. Should EPA determine that IPC is responsible or potentially responsible for response activity at the Site, IPC will receive a separate letter clearly stating such a determination as well as the basis EPA has for making such a determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on behalf of yourself. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$37,500 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Kenneth Talton, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request. If you have any questions regarding this letter, contact Mr. Talton at (214) 665-7475. For legal questions concerning this letter, please have your legal counsel contact Ms. Pam Travis, at (214) 665-8056. Thank you for your attention to this matter.

Sincerely yours,

Ben Banipal, P.E., Branch Chief
Technical and Enforcement Branch
Superfund Division

Enclosures (4)

cc:

International Paper Company
c/o Certified Forest Management LLC
6400 Poplar Avenue
Memphis, Tennessee 38197

ENCLOSURE 1

COLONIAL CREOSOTE SUPERFUND SITE BOGALUSA, WASHINGTON PARISH, LOUISIANA INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to cleanup or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e) 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Site's history or this information request letter, please contact Mr. Kenneth Talton, the designated Enforcement Officer for the Site, at phone number (214) 665-7475, fax number (214) 665-6660 or via email at talton.chuck@epa.gov. Please mail your response within 30 calendar days of your receipt of this request to the following address:

Mr. Kenneth Talton, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

If you or your attorney has legal questions that pertain to this information letter request, please contact Ms. Pam Travis at phone number (214) 665-8056 or via email at travis.pamela@epa.gov. For contact via mail, use the following address:

Ms. Pam Travis, Attorney
Office of Regional Counsel (6RC-S)
U.S. EPA Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

BACKGROUND INFORMATION

American Creosoting Co., was the original owner and operator of the Site which it constructed in the early 1900's. The plant was associated with the Great Southern Timber Company facility located to the west of the site. In 1905, the New Orleans Great Northern Railroad Company acquired the right to construct a railroad across two lots through two right-of-ways. The railroad also acquired timber rights

and use of “ground material” on the property for railroad construction. There is no available information that indicates that New Orleans Great Northern Railroad Company actually owned a portion of the Site or that the right of way was officially cancelled or discontinued. The state of Louisiana revoked New Orleans Great Northern Railroad Company’s corporate status in 1983. In 1932, Great Southern Lumber Company conveyed a 32.06 acre tract of land to Colonial Creosoting Company. Colonial Creosoting Company operated from the late 1930’s to the early 1950’s. In 1957, Colonial Creosoting Company conveyed the 32.06 acre tract of land to Lakeview Sand and Gravel Company, Inc. The contaminants of concern at the Site are creosote components and polynuclear aromatic hydrocarbons (PAHs). In addition to wood treating, other operations at the Site include sand and gravel operations and a redi-mix concrete plant. The Site has been inactive since 2008.

The Louisiana Department of Environmental Quality (LDEQ) conducted several site investigations which began in 1986 when Lakeview Sand and Gravel Company, Inc., registered two underground storage tanks (USTs) at the Site. LDEQ completed a Phase I State Site Assessment report in April, 1993, which recommended that the site proceed to a Phase II assessment. Phase II sampling was conducted on March 24, 1994, revealing elevated levels of polynuclear aromatic hydrocarbons (PAHs), chromium, and lead. The LDEQ recommended that the Site be evaluated for remediation.

No action was taken until July 1999, when a National Pollutant Discharge Elimination System (NPDES) Compliance Inspection was conducted at the facility, focusing on Bogalusa Concrete. In August 1999, LDEQ notified Bogalusa that it needed to obtain a permit for discharge of process water from its facility, which Bogalusa received in June 2000. LDEQ reissued the notice in July 2001.

In December 2004, LDEQ identified that the facility needed an updated water quality permit, which was approved in May of 2006. LDEQ responded to a complaint of runoff from the facility entering a highway ditch in August 2007.

LDEQ completed a Hazardous Waste Site Cleanup Fund Prioritization System evaluation of Colonial in April 2008. On August 12, 2009, LDEQ requested that the facility provide a Site Investigation Work Plan to delineate the vertical and horizontal extent of contamination at the Site. LDEQ referred the Site to EPA in early 2011.

The EPA conducted several inspections at the Site. The September 7, 2012, Site Inspection Report confirmed elevated concentrations of PAHs, including acenaphthene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, fluorene, fluoranthene, 2-methylnaphthalene, phenanthrene, and pyrene, and PCP at the Site, all associated with wood treating processes.

ENCLOSURE 2

COLONIAL CREOSOTE SUPERFUND SITE BOGALUSA, WASHINGTON PARISH, LOUISIANA INFORMATION REQUEST

INSTRUCTIONS AND DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."

7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in the Information Request. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or the Resource Conservation and Recovery Act ("RCRA"), in which case the statutory or regulatory definitions shall apply.

1. The terms "and" and "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any" (e.g., as in "any documents"), shall mean "any and all."
3. The term "arrangement" shall mean every separate contract or other agreement between two or more persons, whether written or oral.
4. The term "asset" shall include the following: real estate, buildings or other improvements to real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations and unincorporated companies, securities, patents, stocks, bonds, and other tangible as well as intangible property.
5. The term "disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material into or on any land or water, including ground water.
6. The term "document(s)" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings/agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telescope, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, photograph, sound recording on any type of device, punch card, disc pack, tape or other type of memory generally associated with computers and data processing (including printouts and the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory), every copy of each document which is not an exact duplicate of a document which is produced, every copy of each document which has any writing on it (including figures, notations, annotations, or the like), drafts of documents, attachments to or enclosures with any document, and every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.

7. The term “generator” shall mean persons who arranged for the disposal or treatment of hazardous substances at the Colonial Creosote Superfund Site where the hazardous substances were released.
8. The term “hazardous material” shall mean any hazardous substances, pollutants or contaminants, and hazardous wastes, as defined below.
9. The term “hazardous substance” shall have the same definition as that contained in Subsection 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and includes any mixtures of such hazardous substances with any other substances.
10. The term “hazardous waste” shall have the same definition as that contained in Subsection 1004(5) of RCRA, 42 U.S.C., Section 9603(5), and 40 CFR Part 261.
11. The term “identify” shall mean, with respect to a natural person, to set forth the person’s name, present or last known business, present or last known job (including job title and position), and personal addresses and telephone numbers.
12. The term “identify” shall mean, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g., corporation [including state of incorporation], partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist.
13. The term “identify” shall mean, with respect to a document, to provide the type of document. This information includes the document’s customary business description, its date, its number (e.g., invoice or purchase order number), if any, subject matter, the identity of the author (including the addressor and the addressee and/or recipient), and the present location of such document.
14. The term “identify” shall mean, with respect to a piece of real property or property interest, to provide the legal description which appears in the county property records office, or in the equivalent office which records real property transactions for the area which includes the real property in question.
15. The term “material(s)” shall mean any and all objects, goods, substances, or matter of any kind including, but not limited to, wastes.
16. The term “operator” shall mean those persons who once owned or operated the place (i.e., Colonial Creosote in Washington Parish, Louisiana) where hazardous substances were released during the time when the hazardous substances were disposed.
17. The term “owner” shall mean the person who now owns the property (i.e., Colonial Creosote in Washington Parish, Louisiana) where the hazardous substances were released or person(s) who previously owned the property.

18. The term “person” shall have the same definition as in Subsection 101(21) of CERCLA, 42 U.S.C., Section 9601(21), and shall include any individual, firm, unincorporated association, partnership, corporation, trust, consortium, joint venture, commercial entity, United States government, State and political subdivision of a State, municipality, commission, any interstate body, or other entity.
19. The terms “pollutant” or “contaminant,” shall have the same definition as that contained in Subsection 101(33) of CERCLA, 42 U.S.C., Section 9601(33), and includes any mixtures of such pollutants and contaminants with any other substances. The term shall include, but not be limited to, any element, substance, compound, or mixture. The term shall also include disease-causing agents which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunction in reproduction), or physical deformations.
20. The term “property interest” shall mean any interest in property including, but not limited to, any ownership interest, an easement, a deed, a lease, a mining claim, any interest in the rental of property, any interest in a corporation that owns or rents or owned or rented property, and any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property.
21. The term “real estate” shall mean and include, but not be limited to, the following: land, buildings, homes, dwelling places, condominiums, cooperative apartments, offices or commercial buildings. The term includes real estate located outside of the United States.
22. The term “release” has the same definition as that contained in Subsection 101(22) of CERCLA, 42 U.S.C., Section 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
23. The terms “Site” or “Facility” shall mean and include operations at Colonial Creosote (Colonial) which is situated on 32.00 acres in Bogalusa, Washington Parish, Louisiana. The facility is within the northwest corner of Section 26, Township 03, Range 13 and lots 3 and 4 in Section 23 and 26, Township 03, Range 13.
24. The term “solid waste” shall have the same definition as that contained in Subsection 1004(27) of RCRA, 42 U.S.C., Section 9603(27), and 40 CFR Part 261.
25. The terms “transaction” or “transact” shall mean any sale, transfer, giving, delivery, change in ownership, or change in possession.

26. The term “transporter” shall mean persons who selected the place where the hazardous substances were released as a disposal site and transported the hazardous substances to that place.

27. The terms “you” or “Respondent” shall mean the addressee of this Request; including, the addressee’s officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

ENCLOSURE 3
COLONIAL CREOSOTE SUPERFUND SITE
BOGALUSA, WASHINGTON PARISH, LOUISIANA
INFORMATION REQUEST

QUESTIONS

Requests for Documents

Please identify (see Definitions) and provide copies of all documents (see Definitions) consulted, examined, or referred to in the preparation of the answers to the above questions including all subparts of each question, or that contain information responsive to the question.

1. Do you have or have you ever had a corporate relationship or other business arrangement with Great Southern Lumber Company and/or Great Southern Lumber Company, Inc., Bogalusa Paper Company, Inc., Gaylord Container Corporation a Maryland corporation, Crown Zellerbach Corporation, a Nevada corporation, Georgia-Pacific LLC or James River Corporation a Virginia corporation and/or the predecessors and/or the successors of the above entities?
 - a. If so, explain your corporate relationship or business arrangement and provide all corporate documentation with respect to your corporate relationship with the entities in question 1 above.
 - b. Did you acquire any of the corporation's assets, liabilities and/or obligations listed in question 1?
2. Were you involved with day-to-day operations with any of the entities identified in question 1 between the early 1900's and 1950's?
 - a. If so, describe your role in such day-to-day operations.
3. Have you in any way been involved with the Site?
 - a. If so, please describe your involvement with the Site.
4. Provide copies of documents related to any involvement identified in question 3(a) above.
5. If you have had any involvement with the Site and/or on behalf of the entities in question 1 above, please provide responses to the questions below.

General Information Concerning Respondent

6. Provide the full legal name and mailing address of the Respondent.
7. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.
8. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

9. If Respondent is a business, please give a brief description of the nature of the business.
10. Describe in detail Great Southern Lumber Company's operating practices at the Site and its practices relating to the storage, handling, transport and disposal of hazardous substances (i.e., PAHs, including acenaphthene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, chrysene, fluorene, fluoranthene, 2-methylnaphthalene, phenanthrene, and pyrene, and PCP).
11. Describe any hazardous substance spills or dumping that took place at the Site. Include, in your description, estimates of the volume of the hazardous substances spilled or dumped, the location of the dumping or spilling, and the name of the hazardous substance(s) spilled or dumped.
12. Please describe any construction or demolition activities that you may have done at any property or buildings that you have an interest in on the Site. In your answer include the following: a) a description of any underground or above ground storage tanks that you may have removed; b) a description of any environmental cleanups that you may have performed; c) a description of any wells or subsurface structures that may have been found during the improvements; d) a description of any improvements that involved excavation that you made to the buildings that you own on the Site.
13. Identify any former employees, or other persons who may have knowledge of the operations and waste handling practices at the Site and/or Bogalusa also known as "Lakeview Sand and Gravel Company, Inc." For all former employees identified, provide a description of their position within the company and dates of employment.
14. If someone else could provide a more detailed or complete response to any of these questions or provide additional responsive documents, please identify such persons and describe the additional information or documents that they may have.

ENCLOSURE 4
PARTIES THAT WERE ISSUED EPA'S JANUARY 13, 2016, INFORMATION REQUESTS
COLONIAL CREOSOTE SUPERFUND SITE
BOGALUSA, WASHINGTON PARISH, LOUISIANA
INFORMATION REQUEST

Donna Simmons
Registered Agent for
Bogalusa Concrete, Inc.
54691 Hwy. 16
Bogalusa, Louisiana 70427

Bogalusa Concrete, Inc.
West Hickory, Box 489
Bogalusa, Louisiana 70427

Fort James Corporation
c/o Great Southern Lumber Company
Registered Agent
CT Corporation System
4701 Cox Road, Suite 285
Glen Allen, Virginia 23060

Fort James Corporation
c/o Great Southern Lumber Company
133 Peachtree Street NE,
Atlanta, Georgia 30303

PARTIES RECEIVING THIS INFORMATION REQUEST

Corporate Service Company
Registered Agent for
Cavenham Forest Industries LLC
2711 Centerville Road, Suite 400
Wilmington, Delaware 19808

Cavenham Forest Industries LLC
9502 Creosote Road
Gulfport, Mississippi 39503

Cavenham Forest Industries LLC
PO Box 15369
Hattiesburg, Mississippi 39404-5369

International Paper Company
c/o Certified Forest Management LLC
C T Corporation System
Registered Agent for Certified Forest
Management LLC
1200 South Pine Island Road
Plantation, Florida 33324

International Paper Company
c/o Certified Forest Management LLC
6400 Poplar Avenue
Memphis, Tennessee 38197 International Paper
Company
c/o IP Realty Holdings LLC
C T Corporation System
Registered Agent for IP Realty Holdings LLC
1200 South Pine Island Road
Plantation, Florida 33324

International Paper Company
c/o IP Realty Holdings LLC
6400 Poplar Avenue
Memphis, Tennessee 38197

104(e) Colonial Creosoting (Great Southern Lumber Co); Ken Talton

Talton 6SF-TE	Travis 6RC-S	Lennox 6SF-RL	Peycke 6RC-S	Johnson 6SF-TE	Banipal 6SF-T